U.S. Department of Justice - Federal Bureau of Prisons
Marianna Federal Correctional Institution
Facility ID No.: 0630062
Jackson County

Air Operation Permit
Permit No.: 0630062-002-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740
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[Electronic file name: 0630062-002-AO.doc]

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Permittee:
U.S. Department of Justice
Federal Bureau of Prisons

Permit No.: 0630062-002-AO
Facility ID No.: 0630062
SIC No(s).: 9223
Project: Air Operation Permit

This permit is for the operation of three 10.3 MMBtu/hr natural gas/distillate package boilers at the Marianna Federal Correctional Institution located at 3625 FCI Road in Marianna, Jackson County; UTM Coordinates: Zone 16, 670.8 km East and 3409.3 km North; Latitude: 30° 50' 5" North and Longitude: 85°11'19" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: April 6, 2011
Renewal Application Due Date: February 6, 2016
Expiration Date: April 6, 2016

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

Rick Bradburn
Air Program Administrator

RB/dm/c

Section I. Facility Information.

This is the initial operating permit for Marianna Federal Correctional Institution and incorporates after-the-fact construction permit 0630062-001-AC, effective December 30, 2009. The boilers were installed in 2006.

Subsection A. Facility Description.

Three 10.3 MMBtu/hour natural gas/distillate package boilers, each equipped with its own separate stack, are used to produce steam for building heat, as well as domestic hot water for the kitchen, showers and restrooms for the facility. They have operated only on natural gas fuel since installation, but are equipped with the capability to burn distillate fuel in case of extended natural gas service interruption. Due to the boilers being installed after June 9, 1989 and having a design capacity between 10 and 100 MMBtu/hr, each of the boilers are subject to the requirements of 40 CFR Part 60 subpart Dc and Rule 62-296.406, F.A.C. (small boiler BACT). A subpart Dc boiler that burns natural gas as a primary fuel and distillate fuel as a back-up, is required only to maintain monthly records of the quantity of each fuel used and fuel supplier certifications for each distillate oil shipment received. In addition, the facility is required to submit to the Department a semi-annual report, if distillate fuel is used, or an annual report, when only natural gas is used. Rule 62-296.406, F.A.C., requires a BACT determination for particulate matter (PM) and sulfur dioxides (SO2). The Department's BACT determination requires the boilers to burn only natural gas except for periods of gas curtailment or other gas supply emergencies. BACT also requires any back-up distillate fuel oil to contain no more than 0.05% sulfur, by weight. Potential emissions are 6.26 tons per year of NOx; 3.78 tons per year of CO; 2.7 tons per year of SO_2; 0.25 tons per year of VOC, and 0.93 tons per year of PM for each of the boilers. Emission calculations are based on the worst case of distillate fuel being used 8,760 hours per year at 0.05% sulfur by weight.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the permit application received November 3, 2010, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Three 10.3 MMBtu/hour natural gas/distillate package boilers (NSPS)

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Permit Application received November 3, 2010
Additional Information Request dated December 17, 2010
Additional Information Response received February 1, 2011
Additional Information Response received March 25, 2011

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

5. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. No emission control devices or systems are ordered at this time. [Rule 62-296.320(1), F.A.C.]

6. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a) Paving and maintenance of roads, parking areas and yards.
b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
e) Landscaping or planting of vegetation.

[Rule 62-296.320(4)(c), F.A.C.; permit 0630062-001-AC]

7. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee

established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. [Rule 62-4.090, F.A.C.]

8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us. A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Panama City at 2353 Jenks Ave, Panama City FL 32405.

9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-0578 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No.	Brief Description
001	Three 10.3 MMBtu/hour natural gas/distillate package boilers (NSPS)

This emissions unit consists of three natural gas/distillate fueled steam package boilers manufactured by Hurst (Model No. S4-GP2-250-150). Each boiler has a rating of 10.27 MMBtu/hr for natural gas and 10.01 MMBtu/hr for distillate. The boilers are normally operated on a rotating schedule with one kept on standby and one or two in use at a time. Each boiler is equipped with its own separate stack. The use of low sulfur oil in a boiler with a heat input of less than 30 MMBtu/hr enables sulfur dioxide compliance verification by fuel supplier certification and recordkeeping. This allows the facility to avoid subpart Dc's PM, opacity standards, associated CEM, and annual stack testing for compliance verification.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum heat input for each boiler shall not exceed 10.3 MMBtu/hour for natural gas and 10.01 MMBtu/hour for distillate fuel. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A**.2.** Methods of Operation - (i.e., Fuels). To comply with Best Available Control Technology (BACT) for PM and SO_2, natural gas will be used as the primary fuel, with distillate oil, as defined by the American Society for Testing and Materials in ASTM D396-98 – "Standard Specifications for Fuel Oils," allowed as an alternative fuel during periods of emergency, such as natural gas curtailment. This distillate oil shall contain no more than 0.05% weight sulfur. [40 CFR 60.41c and 60.42c(d); Rules 62-4.160(2) and 62-296.406(2) & (3), F.A.C.; Permit 0630062-001-AC, and FL State BACT for PM and SO_2]

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.4. Visible Emissions. Permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (six-minute average), except for one two minute period per hour during which opacity shall not exceed 40 percent. [Rule 62-296.406(1), F.A.C.; permit 0630062-001-AC]
{Permitting Note: Specific condition A.4. of Permit 0630062-001-AC contained the sentence, "This opacity standard applies at all times except during periods of startup, shutdown, or malfunction" and included rule reference 40 CFR 60.43c(d). This sentence has been omitted in this permit since the boilers are not subject to the opacity standard of 40 CFR 60 subpart Dc because they combust oil that contains no more than 0.50 weight percent sulfur. [40 CFR 60.43c(e)(4)]}

A.5. Fuel Oil Sulfur Limit. During periods of emergency, such as natural gas curtailment, low sulfur distillate oil (0.05% wt or less sulfur) may be combusted in the boiler(s). Compliance with the fuel oil sulfur limits shall be determined based on a certification from the fuel supplier. Fuel oil sulfur limits

apply at all times, including periods of startup, shutdown, and malfunction. [40 CFR 60.42c(d), (g), (h)(1) and (i)]

Test Methods and Procedures

A.6.a. Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with EPA Method 9 for one hour for each boiler, once during the 12 months prior to the effective air operating permit's renewal date using natural gas, and within 30 days of any boiler being fired (operated) on distillate oil (back-up fuel). Once an initial one hour EPA Method 9 test has been conducted on each boiler using distillate oil, then a subsequent test using distillate oil shall only be required if the boilers operated on distillate for more than 400 hours during the federal fiscal year. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. [Rules 62-4.070, 62-297.310(7)(a)3.b., and 62-297.401(9), F.A.C.]

A.6.b. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.6.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Recordkeeping and Reporting Requirements

A.7. The owner or operator of each unit shall keep records and submit semi-annual reports, to the Administrator, as required under 40 CFR 60.48c(d). All reports shall be postmarked by the 30th day following the end of the reporting period and shall including the following information, as applicable.

a. Calendar dates covered in the reporting period.
b. Each 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
c. A certified statement signed by the owner or operator of the unit that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

[Rule 62-204.800(8)(b)4., F.A.C.; 40 CFR 60.48c (d), (e), & (j)]
{Permit Note: Information from (3) through (10) of 40 CFR 60.48c(e) are not applicable}
{Permitting Note: The submittal of a semi-annual report for the facility's boilers is not required if no distillate oil (back-up fuel) was burned during the reporting period. However, if no distillate oil (back-up fuel) has been burned during the previous reporting period and therefore no semi-annual report has been submitted, an annual report is required to denote that no distillate oil was consumed during the year. In other words, at a minimum an annual report is required. [EPA UWF and National Response letter dated April 19, 2001]}

A.8. Permittee shall maintain records of fuel supplier certifications for each shipment of distillate oil received for emergency use. Fuel supplier certifications shall include the following information:

a. Name of the oil supplier;
b. Statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and
c. The sulfur content or maximum sulfur content of the oil.

[Rule 62-204.800(8)(b)4., F.A.C.; 40 CFR 60.48c(f)]

A.9. The owner or operator of each unit shall record and maintain records of the amounts of each fuel combusted during each calendar month. As an alternative to meeting the requirements of paragraph (g)(1) of 40 CFR 60.48c, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO_2standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel <u>delivered to that property</u> during each calendar month. [Rule 62-204.800(8)(b)4., F.A.C.; 40 CFR 60.48c(g)(2) or (3)]
{Permitting Note: Revised from AC because facility does not have individual meters to each gas appliance.}

A.10. All records required under 40 CFR 60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. [Rule 62-204.800(8)(b)4., F.A.C.; 40 CFR 60.48c(i)]

<u>40 CFR 60, Subpart A - General Provisions Requirements</u>

A.11. Permittee shall comply with applicable parts of 40 CFR 60 subpart A, as an affected facility subject to 40 CFR subpart Dc. [Rule 62-204.800(8)(b)4., F.A.C.; 40 CFR 60.40c(a) and 40 CFR 60.1]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.